



WISCONSIN

**DEPARTMENT OF WORKFORCE DEVELOPMENT**

Division of Economic Support  
Bureau of Welfare Initiatives

**TO: Economic Support Supervisors  
Economic Support Lead Workers  
Training Staff  
FSET Administrative and Provider Agencies  
Child Care Coordinators  
W-2 Agencies**

**BWI OPERATIONS MEMO**

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**Non W-2 [X] W-2 [X] CC [X]**

**PRIORITY: Medium**

**FROM: Stephen M. Dow  
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**SUBJECT: PAPER CASE RECORDS**

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**CROSS REFERENCE:** **IM Manual**, Chapter II, J, 6.0.0  
Operations Memo 98-82 (November 2, 1998)  
Administrative Rule HSS 245  
§ 59.52(18), Wis. Stats.

**EFFECTIVE DATE:** Not Applicable.

**PURPOSE**

This memo provides county and tribal economic support (ES) and Wisconsin Works (W-2) agencies (1) guidelines on the record retention policy for paper case records and (2) EOS reports to assist agencies on which paper records can be purged.

**BACKGROUND**

The Division of Economic Support (DES) has received requests from the W-2 and economic support agencies to provide guidelines on the retention of paper forms in the applicant/ participant case file. The information was provided on November 2, 1998 in BWI Operations Memo 98-82 and is also referenced in the **Income Maintenance Manual**, Chapter III, Part A and B. In addition, to offset the storage costs of paper case records, several EOS reports are now available to assist agencies in purging closed paper case records.

Wisconsin Statutes [59.52 (18)] allows the destruction of case records and other record material of all public assistance that are kept as required under Chapter 49, if no payments have been made for at least 3 years and if a face sheet or similar record of each case and a financial record of all payments for each aid account are preserved, in accordance with rules adopted by the Department of Workforce Development.

Wisconsin Administrative Code DWD 18 (formerly HSS 245) will authorize the Department to adopt rules for the retention of public assistance case records and for the destruction of original case record material when these are retained in the historical files of the Department's Computer Reporting Network (CRN)

and the Client Assistance for Re-employment and Economic Support (CARES) system. The rule applies to all paper or microform records and specifies the period of time that the economic support and W-2 agencies must maintain records. DWD 18 will cover all public assistance programs (including W-2), except general relief. Administrative Rule DWD 18 is being written and will be released shortly.

### **PAPER CASE RECORDS RETENTION POLICY**

The record retention policy, as stated in Wisconsin Administrative Code HSS 245, was six years. To be consistent with the Statutes and based on approval from the State Public Records Board, DES has changed this policy to three years for paper case records (as will be reflected in DWD 18). This new record retention policy became effective March 1, 1999 and applies to all case record information to be retained by the W-2 agency and economic support agency (if not the same) for all public assistance programs - W-2, child care, Medicaid, Food Stamps, and Aid to Families with Dependent Children (AFDC).

### **PAPER CASE RECORDS PURGE CRITERIA**

A paper case record is eligible to be purged if ALL assistance groups (AG), i.e. W-2, Child Care, Medicaid, Food Stamps, and AFDC, have been closed for a period of 3 years and 6 months. Six months has been added to the three year retention period to accommodate instances in which individuals are not disenrolled from the work program immediately upon all AG closures.

Certain exceptions were taken into consideration that will not allow specific cases to be part of the purge report. Record information will not be listed on the purge report if any of the following conditions are true:

1. If the 3 year and 6 month retention period has not been exceeded;
2. If there is a benefit recovery referral for any program against the assistance group which has not been closed (a potential claim);
3. If there is a benefit recovery claim for any program for any individual which has not been closed (a zero balance);
4. If a case has been pulled as part of the federal Quality Control review;
5. If any individual in the case has committed an Intentional Program Violation (IPV); or
6. If a case contains information on asset assessment or divestment for Medicaid purposes.

**Important:** Workers must enter overpayment referrals into CARES (on BVRF) so that they are pulled as exceptions and not listed on an agency's purge report.

### **EOS REPORTS**

To assist agencies, quarterly reports identifying which paper case records can be purged, are provided through EOS. To locate and retrieve the appropriate EOS Report, follow the same procedures used to retrieve other EOS reports. The reports will be located in the reporting subsystem and retrieved by using "C7..". After the report is retrieved, it should be printed to show which paper case records are applicable to purge. The reports contain non-duplicative data. Previous versions of the report should be accessed (if you have not already done so) to provide a complete listing of all cases eligible for purge.

These 6 reports are accessible to agencies now:

1. *C787; CARES-RP772A-QTR; CASES CLOSED >3 1/2 YRS*  
Identifies those cases in which all assistance groups have been closed for at least 3 1/2 years. This is a quarterly report.

2. *C788; CARES-RP773A-QTR; MILW CASES CLOSED >3 1/2 YRS*  
Identifies those cases in Milwaukee in which all assistance groups have been closed for at least 3 1/2 years. This is a special one-time report. Cases eligible for purge will be identified on C787 after this one-time report.
3. *C789; CARES-RP774A-QTR; CASES TRANS OUT OF CTY>3 1/2 YRS*  
Identifies those cases that were transferred out of the specified county at least 3 1/2 years ago. It is possible that a case identified on this report is currently open in another county. This is a quarterly report.
4. *C790; CARES-RP775A-QTR; CASES TRANS OUT OF MIL>3 1/2 YRS*  
Identifies those cases that were transferred out of Milwaukee County at least 3 1/2 years ago. It is possible that a case identified on this report is currently open in another county. This is a special one-time report. Cases eligible for purge will be identified on C789 after this one-time report.
5. *C791; CARES-RP780A-QTR; WP CASES CLOSED >3 1/2 YRS*  
Identifies those work program individuals that have been closed for at least 3 1/2 years. This is a quarterly report.
6. *C792; CARES-RP781A-QTR; WP CASES TRANS OUT CTY>3 1/2 YRS*  
Identifies those work program individuals that have been transferred out of a specified county for at least 3 1/2 years. This is a quarterly report.

The above reports, except for C788 and C790, will be sorted alphabetically by last name of the casehead or work programs individual. All individuals within the case (including children) will be displayed for reports C787 through C790. Reports C791 and C792 list only those individuals in work programs. All six reports display the WP Disenrollment Date. The disenrollment dates are for informational purposes only.

The first quarter of 1999 (January through March) is now available for all six reports. The second quarter reports (April through June) will be available in July 1999. To continue identifying the cases eligible for purge, check the reports the month following the end of each quarter.

Note: Local agencies should expect that the first quarter report could list a substantial number of cases based on the inclusion of all cases prior to March 1999 that meet the criteria of being eligible for purge. After the initial report, the ongoing quarterly reports should be considerably less.

Two additional reports will be available at a later date:

1. CRN Report: These are CRN-only paper case records (not on CARES) that are eligible to be purged. This will be a special one-time report.
2. Work Programs Report for RFA's Completed Three Years Back: This ongoing report will capture Welfare to Work and Children First cases that can be purged.

## **STORAGE COSTS**

Both economic support and W-2 agencies are responsible for case record retention as stated in their contracts with the state. The new three-year retention policy is expected to reduce the storage costs of the economic support and W-2 agencies.

## **MANUALS UPDATED**

The **Income Maintenance Manual** Chapter II, J, 6.0.0 will be updated to reflect information to be retained with the advent of CARES. The previous instructions provided were CRN-related. Operations Memo 98-82 and the IM Manual Chapter III, A, B provide guidance on which forms and verification items are required to be in the case record.